

# **Exhibit 3**

# **Colorado Proposals**

**MDL 3047 – 2024-12-09 Agency Discovery JLB**  
**Colorado – Meta Proposal**

**Search Terms:** Meta made its most recent counterproposal on November 29, 2024 to the Colorado Behavioral Health Administration, Department of Education, Governor's Office, Office of State Planning and Budgeting, Colorado Department of Higher Education, and Colorado Department of Human Services. At a high level, Meta's proposal involves using search combinations that require either "Social Media Terms" or substantive "Harm Terms" to occur in the same document as one of the following "Youth Terms":

(teen\* OR tween\* OR adolescen\* OR kid\* OR youth\* OR minor\* OR young\* OR child\* OR underage\* OR "under-age" OR juvenile\* OR "pre-teen\*" OR preteen\* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen\* z" OR "gen-z" OR "gen\* alpha" OR gen-a\* OR scholar\* OR School\* OR student\* OR pupil\* OR grade\*)

#	Social Media Terms
1	"Youth Terms" <b>AND</b> ("social media" OR "social network" OR Meta OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM*)
	Harm Terms
2	"Youth Terms" <b>AND</b> (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "ACE*" OR "adverse childhood experience" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR reclus* OR stress OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR lonel* OR therap* OR counsel* OR treatment*)
3	"Youth Terms" <b>AND</b> ("pro-ana" OR "BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*)
4	"Youth Terms" <b>AND</b> (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5	"Youth Terms" <b>AND</b> (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)

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6	“Youth Terms” <b>AND</b> (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7	“Youth Terms” <b>AND</b> (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	“Youth Terms” <b>AND</b> (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	“Youth Terms” <b>AND</b> (negative w/3 (appearance OR experience OR affect* OR effect*))
10	“Youth Terms” <b>AND</b> (compar* w/5 (appearance OR social OR other* OR negative))
11	“Youth Terms” <b>AND</b> (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	“Youth Terms” <b>AND</b> (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	“Youth Terms” <b>AND</b> (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14	“Youth Terms” <b>AND</b> (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

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**Custodians:** Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (\*) have been affirmatively proposed and agreed to by the Colorado AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

The Colorado Attorney General’s Office has not proposed custodians for the Colorado Behavioral Health Administration, Department of Education, or the Department of Human Services. Nor has it produced information that is sufficient to allow Meta to identify a representative set of custodians that covers the relevant time period and subject matter for each agency. Accordingly, Meta requests that the Court require those Colorado agencies to identify custodians that meet that criteria within three days of the Court’s order resolving this dispute. Meta reserves the right to request additional custodians in a meet and confer to be scheduled promptly after the agencies’ disclosure of an initial proposed custodian set.

<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Office of the Governor	Isabelle Nathanson*	Health Policy Advisory
Department of Higher Education	Peter Fritz*	Director of Student Transitions and Degree Completion Initiatives
Department of Higher Education	Christina Ingram*	GEAR UP Program Director
Department of Higher Education	Meghan Cave*	Director of College Pathways and Communications
Department of Higher Education	Duane Akerfelds*	GEAR UP Collegiate Advisor
Department of Higher Education	Denise Gondrez*	GEAR UP Collegiate Advisor
Department of Higher Education	Latasha Collins*	GEAR UP Collegiate Advisor

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Department of Higher Education	Desarie Wheeler*	GEAR UP Collegiate Advisor
Department of Higher Education	Heidi Stone*	GEAR UP Collegiate Advisor
Department of Higher Education	Caitlin West*	GEAR UP Collegiate Advisor
Department of Higher Education	Darrion Hatchett*	GEAR UP Collegiate Advisor
Department of Higher Education	Shelby Soto*	GEAR UP Collegiate Advisor
Department of Higher Education	Shaunna Schrock*	GEAR UP Collegiate Advisor
Department of Higher Education	Janell Martin*	GEAR UP Collegiate Advisor
Department of Higher Education	Elizabeth Tabeling-Garcia*	GEAR UP Collegiate Advisor
Department of Higher Education	Monica Moore*	GEAR UP Collegiate Advisor
Department of Higher Education	Francesca Rizz*	GEAR UP Collegiate Advisor
Department of Higher Education	Lisa Hill*	GEAR UP Collegiate Advisor
Department of Higher Education	Daniel Garcia*	GEAR UP Collegiate Advisor
Department of Higher Education	Kathlyn Carroll*	GEAR UP Collegiate Advisor
Office of State Budget and Planning	Edmond Toy*	Chief of Staff

**Exhibit A****Proposed Preliminary Search Terms  
CDHE**

Subject to information learned in the meet and confer, CDHE proposes the following search terms:

Instagram AND Harms AND (“addict! OR ‘mental health’”) AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”) ~~AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”)~~

Facebook AND Harms AND (“addict! OR ‘mental health’”) AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”) ~~AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”)~~

TikTok AND Harms AND (“addict! OR ‘mental health’”) AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”)

“Social Media” AND Harms AND (“addict! OR ‘mental health’”) AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”)

Harms AND (“addict! OR ‘mental health’”) AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”)

**Exhibit A.1****Proposed Preliminary Search Terms  
CDHS**

Subject to further information learned in the meet and confer, CDHS proposes the following search terms, which would be run for **Keyword 1** ("youth" words with OR connectors) **AND Keyword 2** ("mental health" words with OR connectors) **AND Keyword 3** ("social media" words with OR connectors). Additional searches would be run for Keyword 1 (“youth” words with OR connectors) AND Keyword 2 (“mental health” words with OR connectors), as well as Keyword 1 (“youth” words with OR connectors) AND Keyword 3 (“Social Media” words with OR connectors.)

<b>Keyword 1</b>	<b>Keyword 2</b>	<b>Keyword 3</b>
Youth	Mental Health	Social media
Adolescent	Wellbeing	Zuckerberg
Minor	Depression	Meta
Kids	Anxiety	Facebook
Teen!	Sleep disturbances	Instagram
Child!	Insomnia	Snapchat
	Suicide	Tiktok
	Self-harm	Youtube
	Self harm	Twitter
	Compulsive use	Pinterest
	Addict!	LinkedIn
	Eating disorder	BeReal
	Anorexia	Lapse
	Dysmorphia	Reddit

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	Bullying Self-esteem Self esteem Social comparison Psychological distress Emotional distress	Threads VSCO Goodreads Quora Discord Twitch Tumblr Whatsapp Oculus Virtual Reality VR Multiple accounts Image filters
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[Submitting Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc., Instagram, LLC, Meta  
Payments, Inc., Meta Platforms Technologies,  
LLC

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Office of the Attorney General, State of Florida,  
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta  
Payments, Inc.

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State of Montana, *ex rel.* Austin Knudsen,  
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook  
Holdings, LLC, Facebook Operations, LLC,  
Meta Payments, Inc., Meta Platforms  
Technologies, LLC, Siculus, Inc.

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IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:  
4:22-md-03047; 4:23-cv-05448; 4:23-cv-05885;  
4:24-cv-00805

MDL No. 3047

Case No. 4:22-md-03047-YGR  
4:23-cv-05448-YGR  
4:23-cv-05885-YGR  
4:24-cv-00805-YGR

**DECLARATION OF JEN SULLIVAN**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang



1 I, JEN SULLIVAN, declare as follows:

2 1. I am employed as Deputy Attorney General of the State Services Section at the  
3 Colorado Attorney General's Office. I make this declaration based on personal knowledge of the  
4 facts herein based on my experience. If called to testify about its contents, I could and would do  
5 so competently.

6 2. Attorneys in the State Services Section serve as counsel to certain Colorado  
7 executive agencies, including the Colorado Department of Human Services (CDHS), the  
8 Colorado Behavioral Health Administration (BHA), the Colorado Department of Higher  
9 Education (CDHE), the Colorado Governor's Office, the Office of State Planning and Budget  
10 (OSPB), the Colorado Office of Economic Development and International Trade (OEDIT), and  
11 the Colorado Department of Education (CDE)(collectively, the "Colorado State Services  
12 Agencies"). The Colorado State Services Agencies submit that they have not failed in any way to  
13 meaningfully comply with this Court's order.

14 3. Two of the agencies represented by counsel in the State Services Section, the CDE  
15 and the BHA, received subpoenas issued by Meta pursuant to FRCP 45.

16 a. Meta served a subpoena on the BHA on July 17, 2024. To negotiate the subpoena,  
17 the BHA and Meta met on August 6, 2024, August 20, 2024, and August 29, 2024,  
18 and exchanged multiple emails. After these negotiations, the BHA produced  
19 materials and provided a response letter to Meta on September 18, 2024. On  
20 September 23, 2024, Meta sent a letter to BHA holding the subpoena in abeyance.  
21 On November 8, 2024, Meta emailed counsel for the BHA asking for a meeting to  
22 discuss discovery under FRCP 34. On November 14, 2024, counsel for the BHA  
23 and Meta met. Meta, however, rather than discuss discovery directly, asked for the  
24 BHA to provide an accounting of the actions it took to respond to Meta's  
25 subpoena. Counsel for the BHA expressed willingness to supplement the BHA's  
26 subpoena production if Meta had reason to believe the prior production to be  
27 incomplete. Meta, however, gave no indication that it had reviewed the BHA's  
28 production. On November 27, 2024, counsel for Meta asked the BHA to agree to

1 run search terms in lieu of providing the information on what it did to respond to  
2 Meta's subpoena. The BHA agreed to run search terms through its principal  
3 agency, CDHS.

4 b. After issuing the FRCP 45 subpoena, Meta told CDE not to respond as it was  
5 being held in abeyance. By letter dated November 1, 2024, undersigned counsel  
6 informed Meta that the CDE was nevertheless preparing a response to the  
7 subpoena. Undersigned also provided Meta with the name and contact information  
8 for CDE's counsel and their willingness to meet and confer regarding search terms  
9 and custodians. On information and belief, Meta's counsel has not contacted  
10 counsel for CDE to arrange delivery of the responsive documents.

11 4. In my letter dated November 1, 2024, I further provided counsel names, contact  
12 information, and custodians for the following agencies: Governor's Office, OEDIT, OSPB,  
13 CDHE, and for the Colorado Department of Regulatory Agencies (DORA), an agency  
14 represented by attorneys in the Revenue and Regulatory Section, which is another section of the  
15 Colorado Attorney General's Office. I also identified DORA programs that might have  
16 discoverable information.

17 5. In my letter dated November 1, 2024, I also identified two individuals at CDHS  
18 who would coordinate production of records responsive to a Rule 45 subpoena. I further  
19 explained that CDHS is a large state agency with multiple offices and hundreds of employees and  
20 requested the opportunity to meet and confer with Meta to narrow search terms.

21 6. By letter dated November 5, 2024, I offered times for a meet and confer with all  
22 Colorado State Services Agencies that had not received Rule 45 subpoenas, along with DORA. I  
23 also provided information regarding the status of litigation hold letters at each of the Colorado  
24 State Services Agencies and DORA.

25 7. Attached to the letter dated November 5, 2024, were search terms proposed by  
26 CDHE, DORA, and CDHS.

27 8. A meet and confer was held on November 8, 2024, attended by counsel and client  
28 representatives for CDHS, CDHE, DORA, and counsel for the Governor's Office, OEDIT, and

1 OSPB. During that hour-plus conference, the agencies responded to questions from Meta about  
2 their agencies and records. Meta provided feedback on the search terms that CDHS, CDHE, and  
3 DORA had proposed.

4 9. Following the meet and confer, Meta sent undersigned counsel a search terms  
5 “counterproposal” that was extremely broad and much different from the terms proposed by  
6 CDHS, CDHE, and DORA. Meta also indicated that it was considering whether to continue to  
7 pursue records from DORA and OEDIT based on information provided during the meet and  
8 confer, and the counterproposal did not appear to include these two agencies. Undersigned  
9 counsel shared the counterproposal with counsel for all other Colorado State Services agencies  
10 that had not received subpoenas and requested feedback. Meta’s counterproposal is attached as  
11 Exhibit 1 hereto.

12 10. On November 15, 2024, I informed counsel for Meta via email that the agencies  
13 were still working internally to develop information and responses to the “counterproposal” sent  
14 by Meta on November 8, 2024.

15 11. On Friday, November 22, 2024, shortly before the close of business, counsel for  
16 Meta circulated a revised set of proposed search terms and requested a response by Tuesday  
17 November 26, 2024. Undersigned counsel circulated these terms to counsel for the Colorado State  
18 Services agencies and requested feedback. Meta’s revised counterproposal is attached as Exhibit  
19 2 hereto.

20 12. On November 27, 2024, undersigned counsel provided Meta with details about the  
21 issues the Colorado State Services agencies had in running the search terms Meta proposed on  
22 November 8, 2024, due to overbreadth. Those details included (but were not limited to):

- 23 a. CDHS attempted to search the first proposed bullet in Meta’s November 8th  
24 counterproposal, “Social Media/Device Search Terms + Youth Search Terms.”  
25 This search retrieved 102,000 responsive emails (not pages) from 6,500 accounts  
26 which, based on a conservative estimate, would take CDHS personnel just under  
27 1,100 hours *just to export email files responsive to the first of four bullet points*  
28 directed at CDHS in Meta’s November 8th proposal. This translates to 3

1 employees working 40 hours per week 9 weeks simply to download and export  
2 these emails.

- 3 b. Given these massive numbers, CDHS did not attempt a search of the items  
4 requested in the remaining proposed combinations of search term categories. The  
5 resources involved to export and review half a million documents for such  
6 sweeping search terms are significantly overly burdensome.

7 13. Given the issues with overbreadth in the November 8, 2024, proposal, undersigned  
8 counsel included in the November 27, 2024, communication revised proposed search terms,  
9 responsive to the issues Meta had articulated in the November 8, 2024, meet and confer. CDHS  
10 and CDHE's revised proposal is attached as Exhibit 3 hereto.

11 14. On November 29, 2024, counsel for Meta responded to the CDHS and CDHE  
12 search term counterproposal, identified issues with it, and slightly modified its request as follows:

- 13 a. "Meta is open to Colorado agencies running its 11/22 proposal using the non-  
14 Youth-focused combinations, regardless of whether the agency is youth-focused or  
15 not. In other words, all agencies could run the "Youth" terms in Section II with an  
16 AND connector separately applied to search strings 1-15."

17 15. During the week of December 2, 2024, Colorado State Services Agencies that had  
18 not previously been served with a subpoena trialed the search terms proposed by Meta on  
19 November 29, 2024.

20 16. By email dated December 6, 2024, undersigned counsel informed Meta that  
21 CDHS, CDHE, BHA, the Governor's Office, and OSPB are willing to run the search terms  
22 proposed on November 29, 2024, and, assuming they do not return an inordinate number of  
23 irrelevant hits, produce responsive records, and provide hit reports in the event of overbreadth  
24 issues. Undersigned counsel further provided details about technical difficulties the Colorado  
25 state agencies were having running the proposed terms, which must be resolved before they are  
26 able to run the searches. Those technical issues are as follows:

- 27 a. The Agencies use Google Vault. Because Meta's proposed search exceeds 2,000  
28 characters (the Google limit), Google Vault cannot handle the full search (i.e.

1 Section II AND (Search Set 1 OR Search Set 2 [each combination] OR Search Set  
2 3 . . . )) and returns incomplete hits or none at all.

3 b. Further, Google Vault has limitations around proximity searches ("w/3"). In  
4 Google Vault, the proximity search is AROUND #. This proximity is limited in  
5 that: (1) AROUND can't be combined with a wildcard\* search; (2) AROUND can't  
6 be used with parentheses or multiple-word phrases; and (3) there can't be more  
7 than two AROUND terms in a query. In addition, wildcards won't work if more  
8 than 100 hits are generated from the term. In this instance, the search generates  
9 errors.

10 c. Finally, wildcards are not supported in Drive searches. Colorado does not believe  
11 that proximity searches work either, and are doing further research on this.

12 17. As the result of the above-detailed technical issues, undersigned counsel explained  
13 that the Colorado State Services Agencies are unable to generate the hit reports to confirm the  
14 extent of overbreadth until they have Vault-conforming searches for the reasons identified above.

15 18. The Colorado State Services Agencies do not have the Vault expertise to  
16 troubleshoot Meta's proposed search terms and propose terms that would conform to Vault  
17 limitations and requirements, nor the resources to procure it, and requested that Meta adapt its  
18 proposed search terms to Google/Vault limitations, to enable the Agencies to run the searches and  
19 either produce responsive records or provide hit reports for search combinations that appear  
20 overbroad for one or more of the Agencies.

21 19. Undersigned counsel understands that (for now) Meta has de-prioritized the Office  
22 of Economic Development and International Trade (OEDIT) and the Department of Regulatory  
23 Agencies (DORA) and is not currently looking for search terms from these agencies.

24 20. As previously noted to Meta, the Colorado Department of Education (CDE) has  
25 records responsive to the Rule 45 subpoena Meta served on CDE and Meta may coordinate  
26 delivery of their records through counsel.

27 21. Colorado has diligently worked to comply with this Court's discovery orders and  
28 has actively attempted to work with counsel for Meta to obtain search terms that would result in

1 productions that were reasonable in scope and burden. To date, Meta has failed to assist Colorado  
2 agencies with compiling a search string that can even fit within the technological limitations and  
3 capabilities of the state agencies, resulting in a stalemate.

4 22. The Colorado State Services Agencies and DORA understand that the Court's  
5 orders have directed them to comply with party discovery. However, as non-parties to the  
6 litigation with Meta, all Colorado agencies identified as having potentially relevant information  
7 maintain their objections to the orders directing them to comply with party discovery and  
8 maintain their position that the court overseeing the MDL lacks jurisdiction over them. In the  
9 spirit of cooperation, the Agencies are willing to run Meta's proposed searches and, assuming  
10 they do not return an inordinate number of irrelevant hits, produce records, and provide hit reports  
11 in the event of overbreadth issues.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
13 December 9, 2024, in Denver, Colorado.

14  
15 /s/ Jen Sullivan

JEN SULLIVAN

Deputy Attorney General

**MDL 3047: COLORADO AG AGENCY DISCOVERY**

11/8/2024 Proposal

**PROPOSED COMBINATION OF TERM CATEGORIES**

- **Department of Education**
  - Social Media/Device Search Terms
  - Harm/Wellbeing Search Terms
- **Department of Higher Education, Department of Human Services, Governor's Office, Office of State Planning and Budgeting**
  - Social Media/Device Search Terms + Youth Search Terms
  - Social Media/Device Search Terms + Harm/Wellbeing Search Terms
  - Social Media/Device Search Terms + Other Search Terms
  - Youth Search Terms + Harm/Wellbeing Search Terms

**Social Media/Device Search Terms**

- "social media" OR "social network" OR Zuckerberg OR Meta OR Facebook OR Instagram OR Insta OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR wire OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM\* OR device\* OR iphone\* OR android OR phone\* OR screen OR cell\* OR internet OR video OR videogame OR gaming OR apps OR Ipad OR tablet OR laptop OR computer OR chromebook OR LinkedIn OR BeReal OR Lapse OR Threads OR VSCO OR Goodreads OR Quora OR "Virtual Reality" OR VR OR "multiple accounts" OR "image filters"

**Youth Search Terms**

- ((gen OR generation) w/2 (alpha OR "z"))
- teen\* OR tween\* OR adolescen\* OR kid\* OR youth\* OR minor\* OR young\* OR child\* OR underage\* OR "under-age" OR juvenile\* OR "pre-teen\*" OR preteen\* OR U18 or "under 18"
- scholar\* OR School\* OR student\* OR pupil\* OR grade\* freshman OR freshmen OR sophomore\* OR junior\*
- ACE\*

**Harm or Wellbeing Search Terms**

- advers\* w/10 experience\* OR ACE\*
- (bodies OR body) w/3 (mass\* OR shape\* OR fat\* OR image\* OR thin\* OR skinny OR slim\* OR acceptance OR dissatisfaction OR positivity OR image OR dysmorph\*)
- (negativ\* OR compar\*) w/3 (appearance OR experience OR affect\* OR effect\* OR social OR other\*)
- "BMI" OR overweight OR fat OR obes\* OR diet\* OR anorexi\* OR bulimi\* OR orthorexi\* OR appetite OR dysmorph\* OR binge OR purge
- (eat\* OR sleep\*) w/3 (problem\* OR issue\* OR trouble\* OR difficult\* OR disorder\* OR disab\* OR agitat\* OR behav\* OR insufficient OR depriv\* OR disturb\*)

**MDL 3047: COLORADO AG AGENCY DISCOVERY**

11/8/2024 Proposal

- bully\* OR bullie\* OR cyberbull\* OR harass\* OR sextort\*
- transphob\* OR homophob\* OR racis\* OR sexis\* OR (gender w/10 (dysphoria OR iden\*))
- suicid\* OR unalive OR cutting\* OR selfharm OR "self-harm" OR NSSI OR "non-suicidal self injury" OR sad\* OR reclus\* OR (self w/3 (harm OR esteem OR control OR injur\* OR mutilat\* OR regulat\*))
- svap\* OR "ecig" OR "e-cig" OR cig\* OR smok\* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent\* OR opio\* OR opia\* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller\* OR narcotic\* OR drug\* OR alcohol\* OR Juul
- (compuls\* OR problem\* OR addic\* OR overdos\* OR excess\* OR increas\*) w/3 (use\* OR using OR usage)
- dopamine
- (mental w/3 health) OR "TMH" OR (psych\* w/10 (concern\* OR issue\* OR distress\*))
- "negative spiral"
- "social reward\*" OR "social approval"
- "risk factor\*" OR "protective factor\*"
- "social connectedness" w/10 (limit\* OR decrease\* OR less\*)
- danger\* OR warn\*
- wellness\* OR wellbeing OR "well-being" OR empath\* OR compassion\*
- confidence OR "self-confidence"
- health w/5 (interact\* OR behavior\* OR online)
- technology w/5 (responsible OR health\*)
- serious w/5 (concern\* OR issue OR situation\*)
- emotion\* w/5 (abuse\* OR support OR regul\* OR distress\*)
- violen\* OR abus\* OR assault\* OR fight\* OR altercation OR killchallenge OR misbehav\* OR misconduct\* OR shoot\* OR shot OR threat\* OR gun\* OR pistol OR rifle OR firearm OR rape\* OR murder\* OR traff\* OR groom\* OR hookup\* OR solicit\* OR pedophile\* OR predator\* OR sex\* OR extort OR exploit\*
- NCII OR "non-consensual intimate imagery" OR CSEC OR CSAM OR NCOSE OR NCMEC
- "internet crime\*" or ICAC
- (hate\*) w/25 (crime OR attack\* OR conduct\* OR misconduct\*)
- therap\* OR counsel\* OR treatment\* OR inpatient
- "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR anxi\* OR stress\* OR depress\* OR insomnia OR ((personality OR behavior\*) w/3 (disorder\* OR concern\* OR issue\* OR health\* or delinquent))
- "SSRI" OR "SNRI" OR "s.n.r.i." OR "s.s.r.i." OR serotonin OR mood OR "anti-anxiety" OR antidepress\*
- divorce\* OR "foster care" OR "foster family" OR homeless\* OR unhous\* OR ((difficult OR broken) w/5 (famil\* OR home\*))



**MDL 3047: COLORADO AG AGENCY DISCOVERY**

11/8/2024 Proposal

- (Covid\* OR coronavirus OR pandemic OR lockdown OR "lock\* down" OR quarantine OR (social\* W/3 distanc\*)) w/15 (sad\* OR depress\* OR anxi\* OR stress\* OR scar\* OR afraid OR angry OR mad OR worr\* OR lonel\* OR alone)
- "time spent" OR "engagement" OR (watch\* w/2 time) OR impression\* OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "MAU" OR "DAU" OR "MAP" OR "DAP" OR "WAU" OR "WAP"
- addict\* OR staytime OR timespent OR "time spent" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control"
- screen w/10 (time OR manag\* OR control\* OR limit) OR screentime
- "prefrontal cortex" OR "cognitive development" OR neuroadaptation
- (detect\* or develop\*) w/3 (age OR brain\*)
- "emotion study" OR "personalized feedback"

**Other Search Terms**

- polic\* OR practice\* OR presentation OR assembl\* OR initiative\* OR interven\* OR prevent\* OR limit\* OR control\* OR legislation OR advocacy OR lobby\* OR legislat\* OR law OR suspend\* OR revok\* OR fine\* OR sanction\* OR cancel\* OR abandon\* OR ban OR banned OR banning OR concern\* OR problematic OR investigat\* or criminal OR charges OR conviction\* OR arrest\* OR "law enforcement"
- positive\* w/3 messag\*
- deceptive OR decei\* OR fraud\* OR defraud\* OR cheat\* OR lie\* OR misrepresent\* OR mislead\* OR schem\* OR exploit\* OR trick\* OR conceal\* OR hide OR omit\* OR downplay\* OR suppress\* OR "cover up"
- "Consumer Protection Act" OR "consumer protection" OR (consumer w/5 protect\*)
- design w/3 (persuasive OR coercive)

**I. Search Strings for Youth Focused Agencies**

<b><i>Search Set 1 – Youth Use of Social Media</i></b>	
1.	(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”)
<b><i>Search Set 2 – Youth Mental Health / Wellbeing Issues</i></b>	
2.	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3.	(“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5.	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6.	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)

7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9.	(negative w/3 (appearance OR experience OR affect* OR effect*))
10.	(compar* w/5 (appearance OR social OR other* OR negative))
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13.	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc**”)
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

### ***Search Set 3 – Other Case Issues***

15.	(polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)
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## **II. Search Strings for Non-Youth-Focused Agencies**

All search strings referenced above run against below “Youth” gating terms with “AND” connector.

(teen\* OR tween\* OR adolescen\* OR kid\* OR youth\* OR minor\* OR young\* OR child\* OR underage\* OR “under-age” OR juvenile\* OR “pre-teen\*” OR preteen\* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen\* z” OR “gen-z” OR “gen\* alpha” OR gen-a\* OR scholar\* OR School\* OR student\* OR pupil\* OR grade\*)

**Exhibit A****Proposed Preliminary Search Terms  
CDHE**

Subject to information learned in the meet and confer, CDHE proposes the following search terms:

Instagram AND Harms AND (“addict! OR ‘mental health’”) AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”) ~~AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”)~~

Facebook AND Harms AND (“addict! OR ‘mental health’”) AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”) ~~AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”)~~

TikTok AND Harms AND (“addict! OR ‘mental health’”) AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”)

“Social Media” AND Harms AND (“addict! OR ‘mental health’”) AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”)

Harms AND (“addict! OR ‘mental health’”) AND (“youth OR adolescent OR minor OR kids OR teen! OR child!”)

**Exhibit A.1****Proposed Preliminary Search Terms  
CDHS**

Subject to further information learned in the meet and confer, CDHS proposes the following search terms, which would be run for **Keyword 1** ("youth" words with OR connectors) **AND Keyword 2** ("mental health" words with OR connectors) **AND Keyword 3** ("social media" words with OR connectors). Additional searches would be run for Keyword 1 (“youth” words with OR connectors) AND Keyword 2 (“mental health” words with OR connectors), as well as Keyword 1 (“youth” words with OR connectors) AND Keyword 3 (“Social Media” words with OR connectors.)

<b>Keyword 1</b>	<b>Keyword 2</b>	<b>Keyword 3</b>
Youth Adolescent Minor Kids Teen! Child!	Mental Health Wellbeing Depression Anxiety Sleep disturbances Insomnia Suicide Self-harm Self harm Compulsive use Addict! Eating disorder Anorexia Dysmorphia	Social media Zuckerberg Meta Facebook Instagram Snapchat Tiktok Youtube Twitter Pinterest LinkedIn BeReal Lapse Reddit

**Case  
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CO Declaration**

**Exhibit  
3**

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	Bullying Self-esteem Self esteem Social comparison Psychological distress Emotional distress	Threads VSCO Goodreads Quora Discord Twitch Tumblr Whatsapp Oculus Virtual Reality VR Multiple accounts Image filters
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